UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 Renner Boulevard
Lenexa, Kansas 66219

FEB 24 2014

MEMORANDUM

SUBJECT: SPCC Inspection Report
Coastal Energy Corporation Terminal
Willow Springs, MO

FROM: Paul Doherty, On-Scene Coordinator PD
Planning and Preparedness South Branch

THRU: Eric Nold, Acting Chief EN
Planning and Preparedness South Branch

TO: Margaret Stockdale, Chief
Storage Tanks and Oil Pollution Branch

Coastal Energy Corporation (Coastal) owns and operates a 2.8 million gallon bulk oil storage facility in Willow Springs, Missouri. The facility was targeted for inspection by the Superfund Oil Program to determine whether the facility was subject to the Facility Response Planning (FRP) requirements of 40 CFR part 112.

Based on our review of the facility's SPCC plan and a site inspection conducted on February 10, 2014, we have concluded that the facility meets the substantial harm criteria with regard to threat to fish, wildlife and sensitive environments, and the facility should be subject to FRP regulation. The facility's own Certification of Substantial Harm included in their SPCC plan had concluded that the facility did not pose a threat of substantial harm. This finding was based on an improper assumption that a general secondary containment berm surrounding the facility would prevent a worst-case discharge from entering the nearby Eleven Point River, a nationally protected wild and scenic river managed by the U.S Forest Service.

The SPCC Plan Review and Site Inspection Report findings are summarized below:

- The SPCC plan dated December 2009 is out of date and does not accurately describe the current operation.
    - Ten additional bulk storage tanks have been added and two tanks were either removed or were never installed since the 2009 plan was signed.
    - Facility inspections as described in the plan are not conducted and no inspection records are maintained as described in the plan.
    - Training as described in the plan is not conducted and no training records are maintained.
    - Drainage discharge procedures described in the plan are not followed and no records are maintained.

- Twenty-four bulk storage tanks holding asphalt liquid (> 2.4 million gallon capacity) and two loading racks lack specific (sized) secondary containment. The plan states that containment for these tanks is provided by a 5-foot berm that surrounds the property. The loading racks are not addressed by the plan.
- Additionally, it was not obvious during the site inspection that the property was in fact actually surrounded by a 5-foot berm. Part of the reported "berm" may be provided by natural topography or by railroad tracks but the plan does not address the impervious nature of either, nor is containment capacity discussed.
- The facility has had to alter their drainage discharge procedures at the state's direction to collect surface runoff which is then pumped to an open field under a state land application permit. The open field is located on the other side of the property from the drainage pump located at the berm that separates the facility from the Eleven Point River. This process has been automated which does not allow for inspection of accumulated runoff for evidence of oil before discharge. The SPCC plan was never revised to reflect this change in procedure.
- Other than the above-described issues, the site inspection found the facility to be clean and very well maintained with no evidence of unaddressed leaks or spills.

Based on the storage capacity of the facility and the proximity to sensitive environments, we believe this facility would be considered a "high-risk" facility for reporting purposes.

The completed SPCC Plan Review and Inspection Checklist and supporting documentation are attached for your review.

If you have any questions, feel free to contact me at x7924.

Attachments

Attachment 1

Spill Prevention, Control, and Countermeasure (SPCC) Plan for Coastal Energy Corporation Willow Springs, MO

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN
PREPARED FOR
COASTAL ENERGY CORPORATION

DECEMBER, 2009

PREPARED BY:
GREAT RIVER ENGINEERING, INC.
1598 IMPERIAL CENTER, SUITE 2010
WEST PLAINS, MISSOURI 65775
(417) 256-8180

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

PREPARED FOR

COASTAL ENERGY CORPORATION

232 Burnham Road
Willow Springs, MO 65793
(417) 469-2777

Notify the following if any amount of oil is discharged into the navigable waters of the United States:
National Response Center
1-800-424-8802

Missouri Department of Natural Resources
(573) 634-2463

Plant Contacts:
Plant Manager – Scott Altermatt
Secondary Contact – Erik Montgomery

December 16, 2009

I have reviewed the Oil SPCC Plan for the Willow Springs, MO plant and the EPA regulations on Oil Pollution Prevention (40 CFR 112).

It appears, based on my experience, that the Oil SPCC Plan for Springfield Ethanol has been prepared in accordance with good engineering practice.

Russell W. Doss

Date: 12/16/09

State Registration No. E-28272

SEAL

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SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

Prepared For

COASTAL ENERGY CORPORATION

Willow Springs, Missouri Plant

I. PURPOSE OF THE SPCC PLAN

Coastal Energy Corporation has prepared this Spill Prevention Control and Countermeasure (SPCC) plan in accordance with the requirements of 40 CFR Part 112, which was promulgated and is implemented by the US Environmental Protection Agency (USEPA). This plan addressees the procedures, methods, and equipment to prevent discharge of oil of any kind, including petroleum products, from the Springfield Ethanol (here after referred to as "the facility"). The SPCC Plan will be reviewed and evaluated at least once every five (5) years. It will also be reviewed and amended whenever a single discharge of more than 1,000 U.S. gallons of oil occurs or when there have been two (2) reportable spill events within any twelve (12) month period.

Through the proper design of storage facilities, containment installations, and the use of properly trained plant personnel, Coastal Energy Corporation prevents or minimizes all oil spills throughout the facility, and prevents discharge of oil into the waters of the United States.

The use of all practical safeguards, in-plant facilities and equipment, and outside help when necessary eliminate the possibility of a discharge of oil into or upon the navigable waters of the United States.

II. PLAN CERTIFICATION

Facility Name:	Fuel Marketing – Springfield Ethanol Facility
Facility Type:	Ethanol, Liquid Asphalt, Fuel Oil, Polymer
SIC Code:	1422
Date Initial Operation Started:	2002
Facility Address:	232 Burnham Road Willow Springs, MO 65793

Person Designated for Enforcing SPCC Plan: Scott Altermatt – Plant Manager

This Spill Prevention Control and Countermeasure Plan is fully supported by the management of Coastal Energy Corporation. Coastal Energy Corporation will implement this Plan and amend it as needed due to facility expansions, modifications, and improvements.

David Montgomery
President

Date: 12-23-2009

I have reviewed this SPCC Plan in accordance with the requirements of 40 CFR § 112.5

Scott Altermatt
Plant Manager

III. EMERGENCY SPILL EQUIPMENT

The following Emergency Spill Equipment would be brought in as-need basis:

A. Absorbent

B. Buckets and Drip Pans

C. Barrels

D. Pumps

E. Soils

F. Gravel

G. Earth Moving Equipment

H. Protective Clothing and Equipment

I. Oil Pads

IV. CONTINGENCY AND EMERGENCY PROCEDURES

If there were to be a spill at this facility, plant personnel should do the following:

A. Evacuate the immediate area of nonessential personnel.

B. Notify the plant manager (Scott Altermatt) of the type and size of the spill.

C. The Plant Manager or his designated Environmental Manager will then take responsibility for corrective action and final cleanup of the spill.

D. Remove all sources of ignition.

E. Contain the spill with absorbent material. Make every effort to keep the spill from reaching navigable waterways offsite.

F. Cleanup the spill and any contaminated earth.

G. Notify corporate personnel of the size and type of spill.

H. Under the direction of corporate personnel disposes of the spilled material according to current regulations.

V. ABOVE GROUND STORAGE TANKS

All bulk petroleum storage tanks are located on Coastal Energy Corporation property and are located in the Northeast 1/4, Section 32, Township 27 North, Range 9 West, Howell County, Missouri. Appendix A provides a map showing the tank site locations.

A. STORAGE TANKS

Storage tanks are made of steel and are painted with corrosion resistant paint. All outside tanks are fitted with engineering controls consisting of tank volume indicators. These indicators allow the operator to see the volume of the tank. This will prevent an operator from overfilling a tank.

Below are narrative descriptions of each storage tank:

Ten (10) - 30,000 gallon ethanol tanks

Four (4) – 420,000 gallon liquid asphalt tanks

One (1) – 210,000 gallon liquid asphalt tank

One (1) – 210,000 gallon fuel oil tank

Ten (10) – 30,000 gallon liquid asphalt tanks

Two (2) – 6,000 gallon polymer tanks

One (1) – 10,000 gallon diesel fuel tank

These tanks are set on concrete slabs. The ten ethanol tanks are surrounded by a concrete containment wall capable of holding 60,000 gallons. The remainder of the tanks are surrounded by earthen berms approximately 5' high. Rainfall accumulation within the berm is discharged through two valved drain pipes.

Rainfall accumulation is manually drained from containment area via a drain valve that is normally closed. Visual observations for signs of contamination are performed prior to and during discharge.

B. INVENTORY CONTROL

Storage tanks are gauged on a monthly basis for tanks in Storage Areas. Tank gauging measurements are compared to book inventories to document tank integrity

C. SPCC CONSIDERATIONS

All storage tanks are surrounded by sufficient secondary containment capable of storing at least 110% of the volume of the largest tank.

Stormwater is manually removed from the containment areas only after visual observations for contamination are made.

Notations are made in the SPCC Logbook when containment areas are drained of stormwater and will contain the following information --

1. Date/Time of Discharge;
2. Name of Operator;
3. Storage Area drained;
4. Observation of discharge (sheen, etc.); and Volume discharged.

D. FIRE SAFETY

1. Warning Signs

   Signs bearing the legends "DANGER - NO SMOKING, MATCHES, OR OPEN FLAMES" or similar language are posted on every tank or tank facility. These signs are visible from all angles of approach.

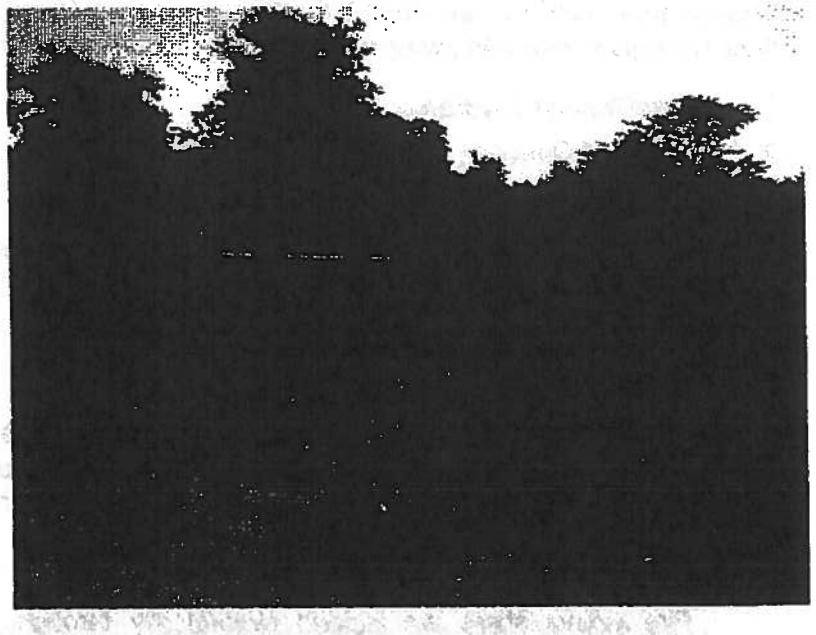
2. Fire Fighting Equipment

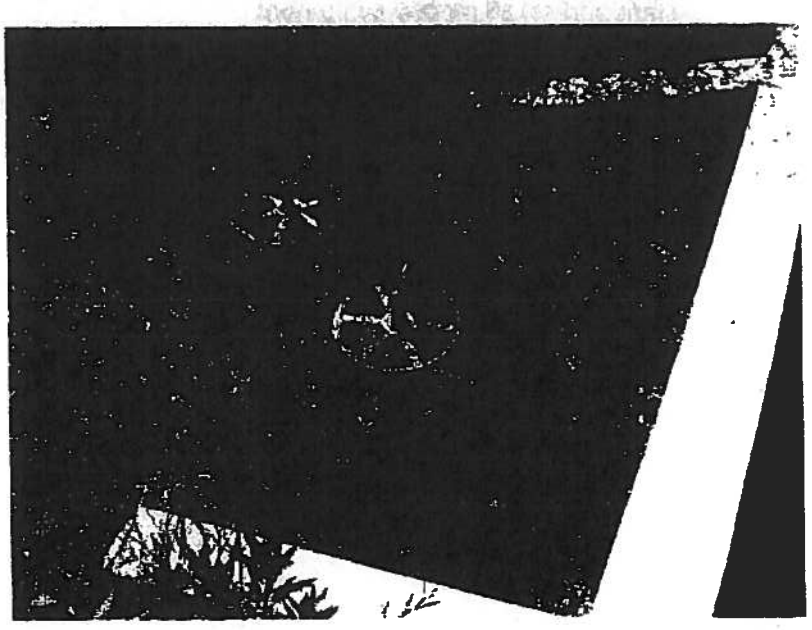
   Fire extinguishers are located strategically throughout the entire plant and on all mobile equipment.

3. In the event of a fire, plant personnel are instructed to call the fire department and only use plant fire fighting equipment for personnel safety.

VI. SURFACE DRAINAGE

This Coastal Energy Corporation is located in Willow Springs, Missouri. The facility surface drainage flows toward the stormwater retention berm along the northeast boundary of the property. The property is graded such that any spill will drain to the retention berm. Drainage through the berm is controlled by two 6" steel pipes equipped with wheel valves.





VII. FACILITY TRANSFER OPERATIONS

There are no underground pipes located at the facility. All aboveground valves and pipelines should be subjected to regular examination by operating personnel such as:

Valve glands and bodies

Flange joints

Expansion joints

Catch pans

Pipeline support

Locking of valves

Pump nozzles

Any spillage from the pipelines, pump nozzles or other connections is immediately contained, picked up and disposed of according to applicable regulations.

VIII. FACILITY LOADING & UNLOADING

A. Railcar Unloading

Railcar unloading consists of three (3) sets of manifold unloading pipes for three different materials stored in the bulk storage tanks. These pipes are above ground and are equipped with a check valve and/or manual valve to prevent back flow from the tank. These pipes are capped or valved off when not in use.

B. Truck Loading

The truck loading for ethanol is provided through one (1) metered pump. The pump and nozzles are located on the south side of the ethanol containment area. The overflow shutoff of the nozzle and pump shut off when the nozzle is replaced on the pump. Truck loading for fuel oil and liquid asphalt are provided through unmetered pumps. Fuel oil and liquid asphalt are loaded by weight.

IX. SPILL REPORTING AND DOCUMENTATION

All spills will be documented as to the following information:

A. Date of spill accident,

B. Location of spill accident;

C. Type of oil or fuel spilled;

D. Quantity oil/fuel spilled;

E. Quantity oil/fuel contained;

F. Description of spill accident;

G. Corrective action taken; and

H. Preventive measures taken to prevent reoccurrence.

The Spill Report will be reviewed by the Safety Director and Environmental Manager or their representatives.

Notify the following if more than 1,000 gallons are spilled in one(1) event or between two(2) spill events within twelve(12) consecutive months:

National Response Center

800-424-8802

Missouri Department of Natural Resources

573-634-2463

EPA Oil and Chemical Spill Reporting

913-236-3778 (24 hour)

A copy of the Spill Report will be filed with the Missouri Department of Natural Resources and EPA Region 7.

A copy of the Spill Report is found in Appendix D.

X. TANK FACILITY INSPECTION AND RECORDING

A. DAILY INSPECTIONS

All personnel using the facility have been instructed to inspect each storage area when they are in that vicinity. Routine monitoring of the bulk storage area should provide adequate response to any spills that may occur. Personnel have been instructed to notify their Plant Manager in the event that any spillage is detected.

B. MONTHLY INSPECTIONS

Each bulk storage tank will be given a thorough visual inspection once per month by monthly safety inspection teams. These records will be maintained for five (5) years.

C. YEARLY INSPECTIONS/TRAINING

Annual refresher training for all personnel using the facility will stress the contingency plan and will be conducted by the Environmental Manager or his representative.

All inspections and annual training will be documented and maintained for a minimum of five (5) years. An example of an Annual Inspection Form is provided in Appendix B.

XI. FACILITY SECURITY

A road passing by the scale house is the only point of access to the facility. Locks on pumping equipment are also provided.

XII. STAFF AND PERSONNEL TRAINING

A. JOB TITLE AND DESCRIPTIONS

Job title, job description, and name of employees are kept as part of the records of the facility. Job descriptions include requisite education, skills and other necessary qualifications as well as the assigned duties for each position.

B. TRAINING CONTENT, FREQUENCY AND TECHNIQUES

1. Initial Training

Personnel who operate or maintain equipment will receive training and instruction on the prevention of discharges of oil and petroleum products. They shall also receive training on applicable pollution control laws, rules and regulations.

2. Annual Review and Update Training

Annual review of the SPCC plan will be conducted by Plant Manager during a regular scheduled meeting. Particular attention will be addressed to the Spill Reporting and Contingency Plan sections.

XIII. RESPONSIBILITY

A. The Facility Manager is responsible for the organization and training of all personnel in the spill control prevention and countermeasures plan. His duties when called will be to coordinate the actions of the employees involved and take the necessary steps to minimize any spills.

B. The Employees that use the facility will have charge of all activity until the Plant Manager or designated Environmental Manager (EM) has been notified and assumed those duties. He will be responsible for notifying the Plant Manager or designated EM.

C. All other personnel that visits the site will be responsible for reporting any and all oil spills or leaks directly to the Plant Manager on duty. Reporting personnel will then standby for further instructions. Given the magnitude of the spill, the equipment at hand and the abilities and training of the personnel, containment of the spill may commence simultaneously with the reporting.

D. Each fuel storage tank and the surrounding area will be observed, each day the site is visited, for evidence of spillage by. Any spillage observed by employees is to be reported immediately to the Plant Manager on duty.

E. The Spill Prevention Control and Countermeasure Plan will be reviewed and updated every five (5) years or as necessary.

XIV. SPILL HISTORY

There have been no spills in the history of the Coastal Energy Corporation, Willow Springs Facility.

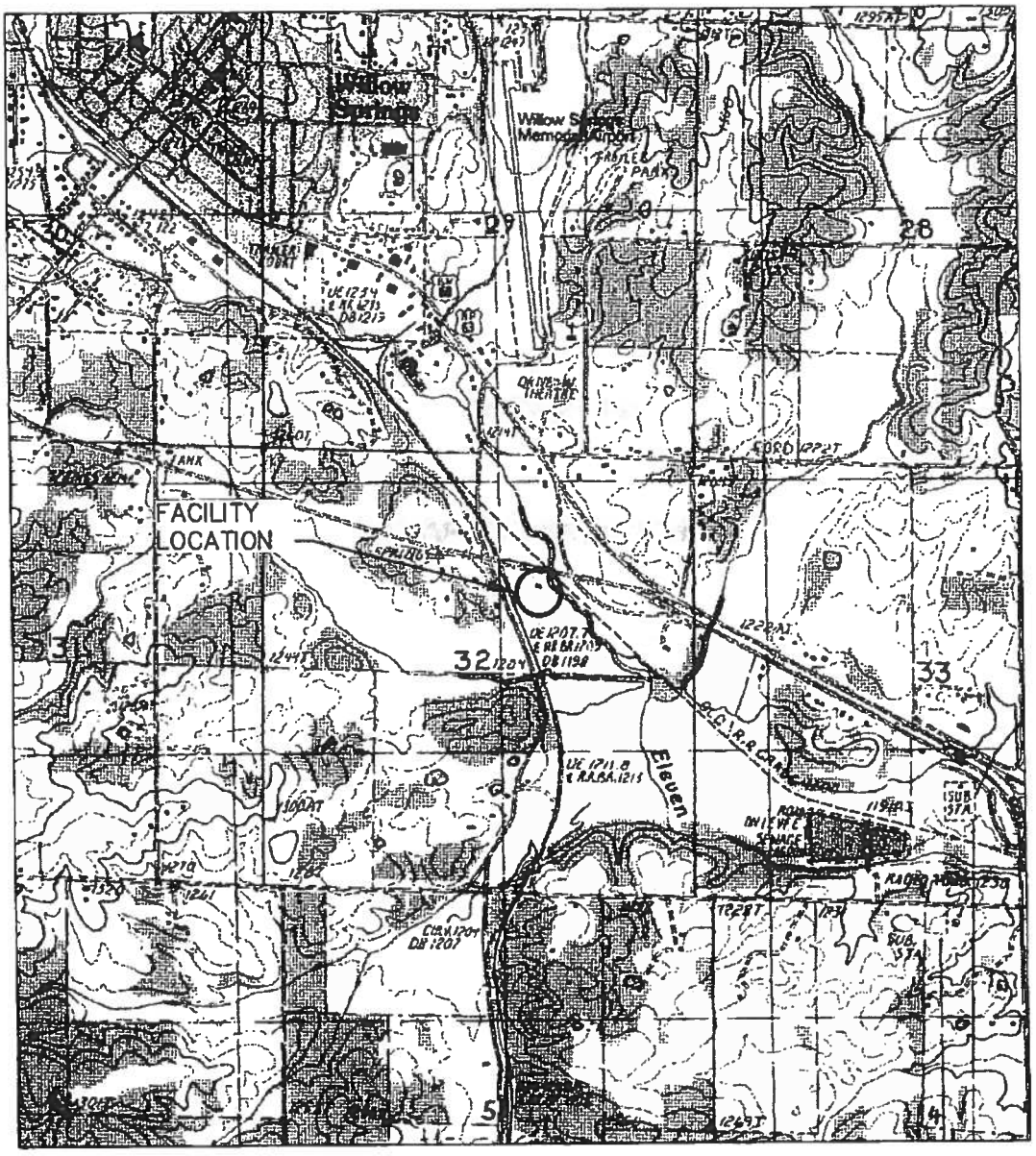
XV. EMERGENCY CONTACTS

In the event of a spill or imminent threat of a spill, the following persons should be notified immediately:

Name	Work Phone	Mobile Phone
• Scott Altermatt, Plant Manager	417-469-2777	417-252-1060
• Erik Montgomery, Vice-President	417-469-2777	417-252-1040
• David Montgomery, President	417-469-2777	417-252-1050

APPENDIX A

TANK SITE LOCATION MAP



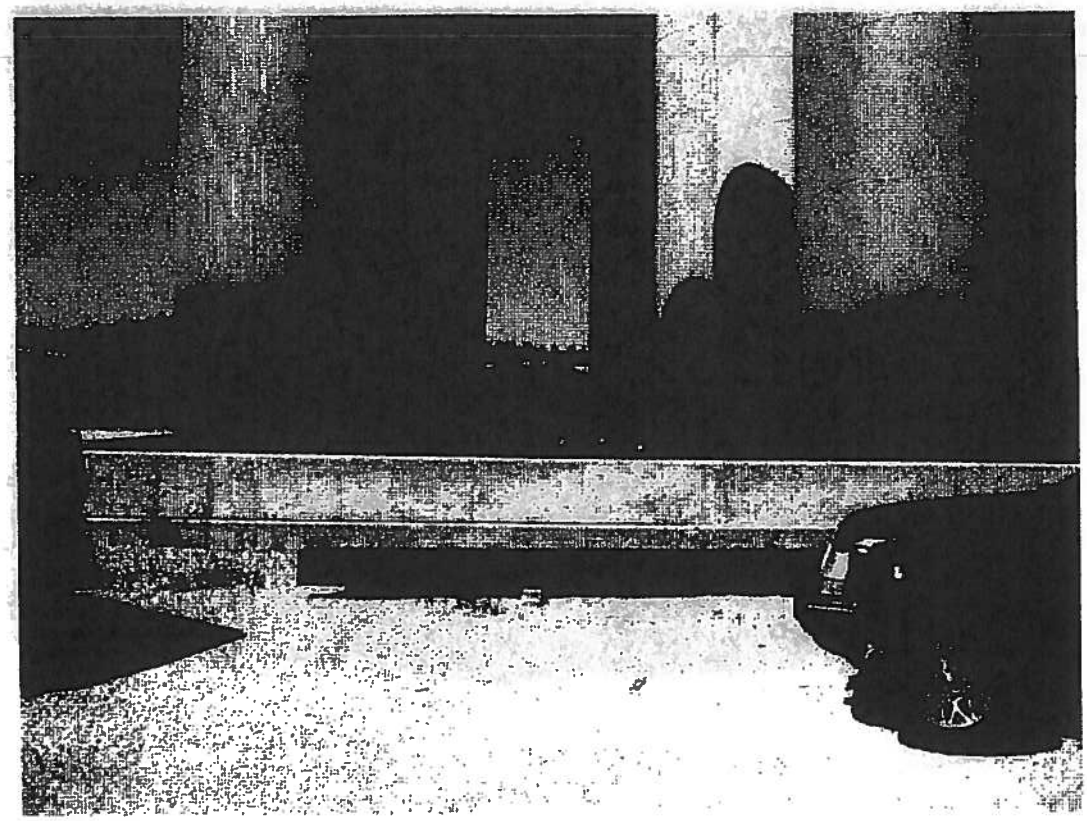
LOCATION SKETCH
SCALE: 1" = 2000'

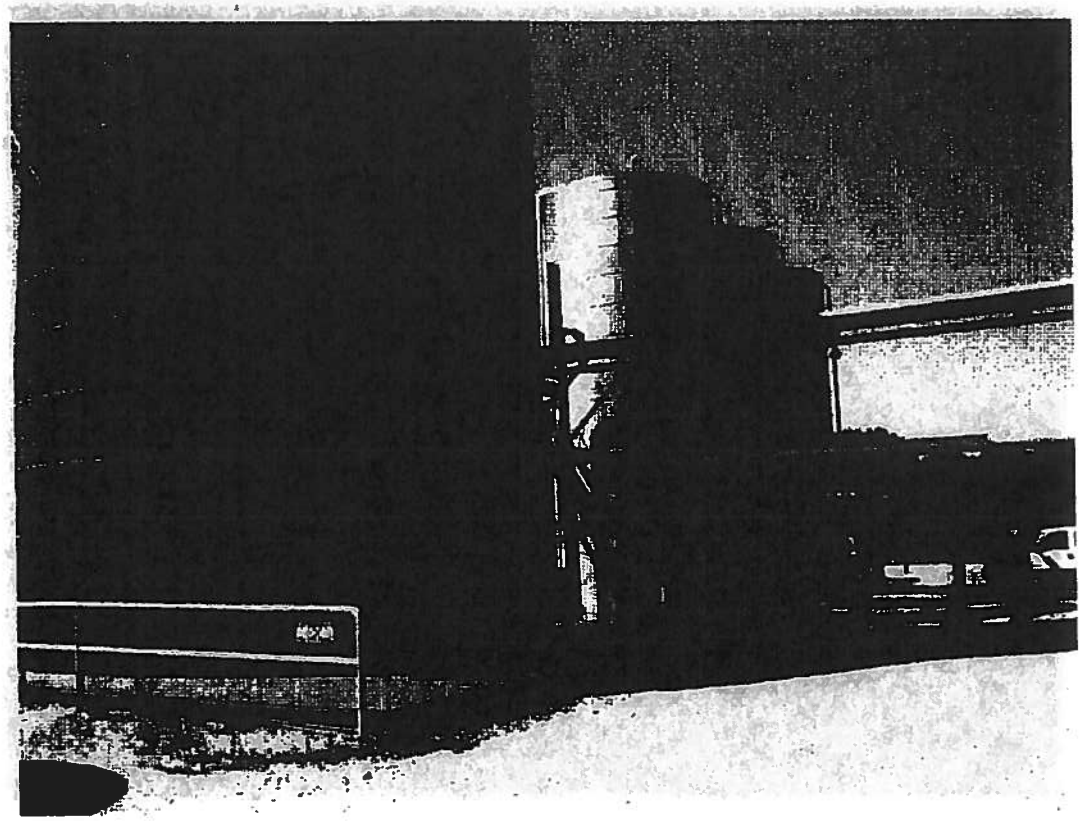
NORTH

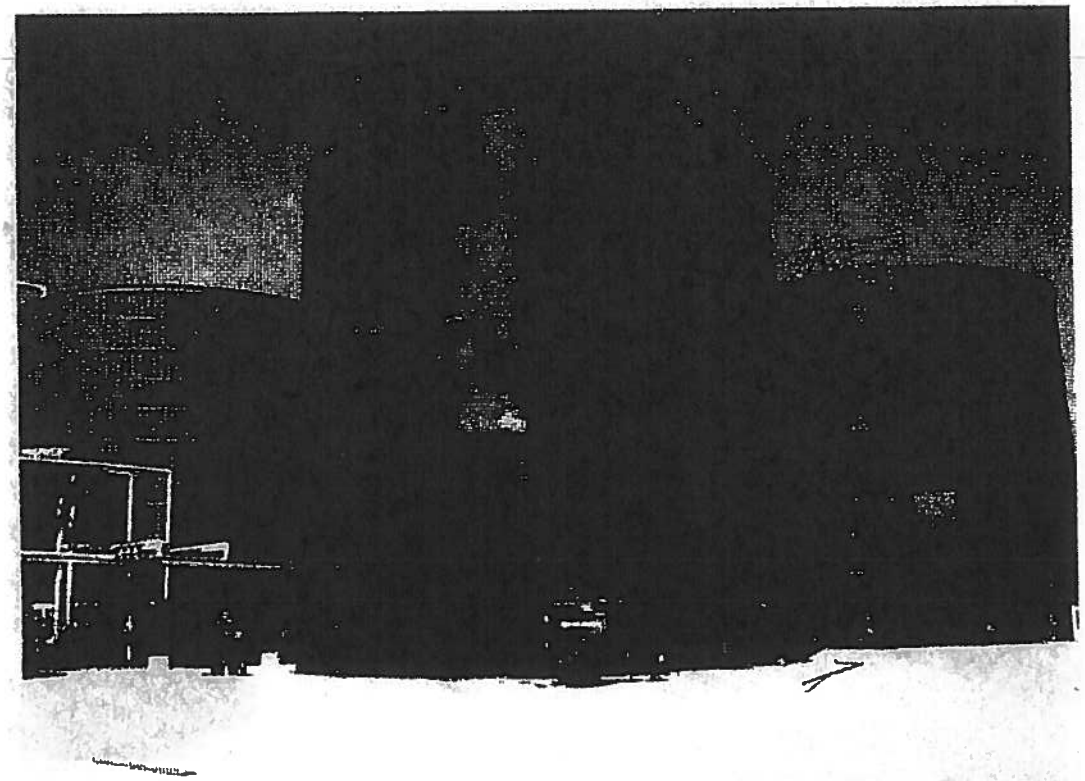
COASTAL ENERGY
LOCATION MAP
WILLOW SPRINGS, MISSOURI
SECTION 32, T27N, R9W

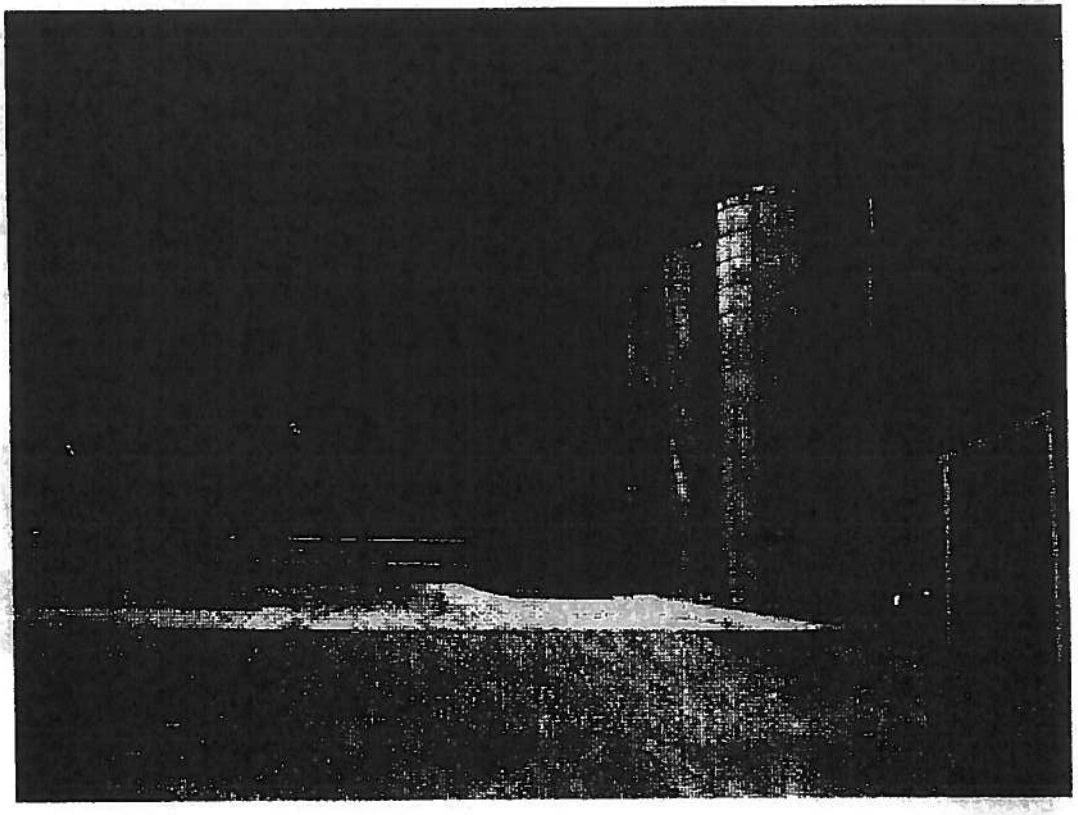
APPENDIX B

TANK SITE PHOTOGRAPHS









APPENDIX C

ANNUAL INSPECTION FORM

ANNUAL INSPECTION REPORT

Location _____ Date _____
Liquid Level _____
Tank No. _____ Temp. _____
Capacity _____ Diameter _____

1. Weather Stripping or Flashing _____
   a. Are all pieces tight against shell? _____
   b. Are any pieces missing or (Photo No. _____
   How many? _____
2. Hoses and Piping
   a. General appearance of hoses _____
   b. Any leaks?_____ If so, explain _____
   c. Aboveground piping free of leaks? _____
   d. Pressure testing _____
3. Roof Ladder _____
   a. Does ladder appear to roll easily or need repairs? _____
4. Contamination
   a. Is roof free of oil and water? _____ If not, indicate percent coverage of each liquid and depth at worst location on attached drawing. ____
5. Corrosion Control
   a. Note general appearance of paint on shell, roof, ladder and structural members:
   _____
   b. Is rusting or pitting occurring on any of the above? _____
   c. Are all insulating flange washers and sleeves in place? _____
   _____
   d. Are all ground and/or anode straps in place?_____
6. Are high-level alarms functioning properly? ____ Tested to verify? _____
7. Other Observations
   a. Note anything that might affect smooth movement of roof and any problem that would allow escape of vapors or air pollution:
   _____
8. Show any damaged areas or problem areas (on tanks with floating roof, show location and size of gaps in seal) on attached drawing.
9. Remote and side gauges working _____
10. Metals thickness testing _____

APPENDIX D

SUBSTANTIAL HARM CRITERIA CHECKLIST

CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST

FACILITY NAME: Coastal Energy Corporation, Willow Springs Facility

FACILITY ADDRESS: 232 Burnham Road

Willow Springs, MO 65793

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
   Yes _____ No _____

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
   Yes _____ No _____

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?
   Yes _____ No _____

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water in stake?
   Yes _____ No _____

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
   Yes _____ No _____

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

_____ _____

Name (please type or print) Signature

_____ _____

Title Date

APPENDIX E

SPILL REPORT FORM

Spill Report Form

Plant Manager
Scott Altermatt

Coastal Energy Corporation
232 Burnham Road
Willow Springs, MO 65793

Phone (417) 469-2777

Report Date_____

Date & Time of Spill _____ Is Evacuation Needed?Yes / No

Location of Spill _____

Type of Oil/Fuel or Chemical Released_____ Quantity Spilled _____

Quantity Contained in Secondary Containment:_____ Quantity Escaping Ash Grove Property: _____

Size of Oil Sheen (on water) _____ Square feet/yards Any injuries_____

Cause of Spill: _____

Description of Accident: _____

_____

_____

AGENCIES Contacted **MO Spill #** _____

Federal Spill #_____

Corrective Action Taken:

	Type	Quantity
Equipment used to contain spill:	_____	_____
	_____	_____
Equipment used to clean-up spill:	_____	_____
	_____	_____

Disposal Method: _____

Equipment Repairs Made: _____

Preventive Measures taken to prevent reoccurrence: _____

_____

SEE BACK SIDE FOR INSTRUCTIONS

Report written by: _____ Review by: _____

Date: _____ Date: _____

Additional Comments_____

_____

RETURN TO ENVIRONMENTAL COMPLIANCE

Spill Report Form
INSTRUCTIONS

Upon discovery or report of a spill:

1) Complete as much of the top half of the Spill Report Form as possible (fill in the blanks); this information will be requested if a phone notification is made. ESTIMATE IF NECESSARY!

2) Determine if ANY of the following criteria has been met:
   A) Has 25 gallons of a petroleum product been spilled/released.
   B) Has 100 pounds of a chemical been spilled/released.
   C) Has any amount of oil, fuel or chemical been discharged Into Waters of the State. Waters of the State are defined to include: drainage ditches; streams; or any tributaries leading to the Stahl Creek. A reportable quantity includes any film, sheen on the surface, discoloration, or any sludge or emulsion under the surface or on the shorelines.

3) If **any one** or more of A, B or C is met, a State and/or Federal notification must be made immediately (within 15 minutes) of the discovery of the release or spill.
   If you are not sure that the reporting criteria has been met (e.g. you don't know if the release was 24 gal. Or 55 gal.), it is better to report.

4) When contacting any agency they will give you a spill #. **Write it on this sheet in the blank(s) provided**. They will almost always insist on a fixed number; e.g., 10 gallons. In many cases, they can't put a range like 5 to 10 gallons in their reports. When giving information that has yet to be determined, use a phrase like "The exact amount is yet to be determined, but I would estimate the amount to be _____ gallons".

5) Notify the MDNR: A) if any amount of chemical is discharged into the water or under the surface of the ground.

   B) if more than 25 gallons of petroleum products or 100 pounds of a chemical are spilled/released. Releases inside of a building need not be reported, if the material 1) is totally contained within the structure and 2) will be cleaned up within 24 hours.

MDNR Spill Response Phone: 1-573-634-2436

6) Region G Hazmat/West Plains FD Phone: 1-417-256-2424

7) National Response Center (NRC) Phone: 1-800-424-8802

8) Notify Corporate Environmental as soon as possible.
   Common materials that must be considered for reporting if released:

Petroleum Products	Process Chemicals
Diesel Fuel	Antifreeze Compounds (e.g. Ethylene Glycol, etc.)
Fuel Oil	Cement Additives (e.g. Witcamide, Hydrophoe, etc.)
Gasoline	Cleaning Solvents (e.g. Degreasol, etc.)
Greases	Dust Suppressant (e.g. Flowpro, etc.)
Hydraulic Fluids	Grinding Aids (e.g. MTDA-B, CGA-5, etc.)
Oils	

CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST

FACILITY NAME: Coastal Energy Corporation, Willow Springs Facility

FACILITY ADDRESS: 232 Burnham Road

Willow Springs, MO 65793

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
   Yes _____ No X

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
   Yes _____ No X

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?
   Yes _____ No X

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water in stake?
   Yes _____ No X

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
   Yes _____ No X

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

David Montgomery
Name (please type or print)

David Montgomery
Signature

President
Title

12/23/2009
Date

Attachment 2

SPCC Plan Review and Inspection Checklist